UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

-against-

REED GALIN,

ECF CASE

15-CV-6992 (JMF)

Plaintiff,

NOTICE OF MOTION

KUNITAKE HAMADA,

Defendant.

PLEASE TAKE NOTICE that Defendant Kunitake Hamada, by and through his counsel, Cahill Partners LLP, upon the accompanying Memorandum of Law, the accompanying Declaration of John R. Cahill and the exhibits thereto, and all prior proceedings heretofore had and all papers filed herein, will move this Court, at a date and time to be determined by the Court, for an order dismissing with prejudice the claims against her in Plaintiff's Complaint pursuant to Federal Rule of Civil Procedure 12(b).

Dated: New York, New York September 25, 2015

CAHILL PARTNERS LLP

By: s/John R. Cahill

John R. Cahill Ronald W. Adelman Paul S. Cossu 70 West 40th Street New York, NY 10018 212-719-4400

Attorneys for Defendant Kunitake Hamada